

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ZACK K. DE PIERO,

Plaintiff,

v.

PENNSYLVANIA STATE UNIVERSITY and  
DAMIAN FERNANDEZ, MARGO  
DELЛИCARPINI, LILIANA NAYDAN, CARMEN  
BORGES, ALINA WONG, LISA MARRANZINI,  
FRIEDERIKE BAER, and ANEESAH SMITH, in  
their official and individual capacities

Defendants.

CIVIL ACTION NO:  
No. 2:23-cv-02281

**JOINT STIPULATION FOR EXTENSION OF TIME TO ANSWER**

Pursuant to Local Rule of Civil Procedure 7.4(b)(2), counsel for Plaintiff Zack De Piero and counsel for Defendants hereby stipulate as follows:

1. Plaintiff filed an Amended Complaint on July 18, 2023. (Doc. 4).
2. Defendants filed a Motion to Dismiss Plaintiff's Amended Complaint on September 25, 2023. (Doc. 23).
3. Plaintiff filed an Opposition to Defendants' Motion to Dismiss on October 10, 2023, (Doc. 24), and Defendants filed a Reply on October 24, 2023. (Doc. 28).
4. On January 11, 2024, the Court issued a Memorandum Opinion and Order granting in part and denying in part Defendants' Motion to Dismiss. (Docs. 31 and 32).
5. The Court's Order therefore makes the deadline to Answer the Amended Complaint per Fed. R. Civ. P. 12(a)(4) January 25, 2024.

6. On January 18, 2024, the parties participated in a Settlement Conference before the Honorable Richard A. Lloret, United States Magistrate Judge. (Doc. 29).

7. The parties are continuing settlement discussions, and a second Settlement Conference before Magistrate Judge Lloret is scheduled to take place on January 26, 2024 at 9:30 a.m.

8. The parties stipulate that Defendants shall have until February 26, 2024 to Answer Plaintiff's Amended Complaint.

9. No prior extension for this deadline has been sought. No party will be prejudiced by this delay.

Respectfully Submitted,

**ALLEN HARRIS PLLC**

/s/ Michael Thad Allen (with permission)  
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*Attorney for Plaintiff Zachary K. De Piero*

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*Attorneys for Defendants*

Date: January 24, 2024

**SO ORDERED AND APPROVED:**

**Date:** 01/26/2024

/s/Wendy Beetlestone, J.  
WENDY BEETLESTONE , J.

**CERTIFICATE OF SERVICE**

I hereby certify that on the date stated below, I caused a true and correct copy of the foregoing *Joint Stipulation* to be served upon counsel through electronic filing and electronic mail on the following:

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*Attorney for Plaintiff Zachary K. De Piero*

*/s/ James A. Keller*  
James A. Keller, Esq.

Dated: January 24, 2024